

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WILLIAM H. ANDERSON,
Plaintiff,

v.

STEP BY STEP, INC.,
Defendant.

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Case No.

2:21-cv-04260-WB

PLAINTIFF'S RESPONSE TO DEFENDANT'S BILL OF COSTS

Plaintiff, William H. Anderson, by his attorney, Dennis L. Friedman, Esquire, hereby responds to the defendant's Bill of Costs filed by the defendant on May 11, 2022.

1. Plaintiff challenges portions of the Magna Legal Services' (Court Reporter's) total bill in the amount of \$1,476.70. Defendant's counsel is believed either to have a contractual relationship with the Court Reporter or to have a professional relationship with the Court Reporter through the Court Reporter's Corporate Account Program. Plaintiff challenges portions the Court Reporter's invoice relating to the expedited delivery charge in the amount of \$484.95, as the deposition of the plaintiff was held two days before the end of the discovery period. Plaintiff challenges the Court Reporter's per page rate to the extent that the per page rate is greater than the rate charged for deposition services in other matters involving defendant's counsel. Plaintiff challenges the Court Reporter's appearance fee for the same reasons. Plaintiff challenges the basic cost of the original and certified copy of the transcript to the extent that the number of pages is overstated. Plaintiff challenges

the \$.25 per page charge for each page of exhibits which were provided to the Court Reporter, which the Court Reporter merely scanned

2. With regard to the charges identified in defendant's Exhibit B, plaintiff challenges the charges incurred on 2/25/2022, to the extent that the charges for three copies was unsupported and that the "exemplification of documents" should not have pertained to all copies.

3. With regard to the charges identified in defendant's Exhibit B, plaintiff challenges the charges incurred on 3/1/2022 and 3/9/2022, as those charges were for the benefit of the defendant's own use.

4. With regard to the charges identified in defendant's Exhibit B, plaintiff challenges a portion of charges incurred on 3/14/2022, as those charge inflated the number of pages.

5. To the extent that there are contested issues which require further evidentiary development and/or confirmation, plaintiff requests that the Clerk permit plaintiff to explore those issues further.

s/ Dennis L. Friedman

DENNIS L. FRIEDMAN
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Plaintiff's Response to Defendant's Bill of Costs* was served upon the following by electronic filing this date to:

Jennifer M. Chalal, Esquire
Nancy Abrams, Esquire
Spector Gadon Rosen Vinci P.C.
Attorneys for Defendant,
Step By Step, Inc.
Nancy Abrams <nabrams@sgrvlaw.com>
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s/ Dennis L. Friedman

DENNIS L. FRIEDMAN, ESQUIRE

Dated: May 18, 2022